

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

TAMARA HAWKINS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 4:23-cv-1126
	)	
CHAMBERLAIN UNIVERSITY LLC,	)	
	)	
Defendant.	)	

**Notice of Removal**

Defendant Chamberlain University LLC (“Chamberlain”), formerly known as “Chamberlain College of Nursing LLC,” and sued under the misnomer “Chamberlain University College of Nursing and Health Science, Inc., d/b/a Chamberlain University,” hereby removes this case from the Circuit Court of the City of St. Louis, Missouri, to the United States District Court for the Eastern District of Missouri, Eastern Division. As grounds for removing this action, Chamberlain states:

**The Parties**

1. Plaintiff Tamara Hawkins is an individual who is domiciled in Missouri and is a citizen of Missouri. *See* Petition (stating Plaintiff’s domicile as 2322 Menard Street, St. Louis, Missouri 63104).
2. Chamberlain is a limited liability company organized under the laws of Delaware. “[A]n LLC’s citizenship is that of its members for diversity jurisdiction purposes.” *GMAC Com. Credit LLC v. Dillard Dep’t Stores, Inc.*, 357 F.3d 827, 829 (8th Cir. 2004). The sole member of Chamberlain is Chamberlain College of Nursing and Health Sciences, LLC, a limited liability company organized under the laws of Delaware. The sole member of Chamberlain College of

Nursing and Health Sciences, LLC, is Adtalem Global Education Inc., which is a corporation incorporated under the laws of Delaware with its principal place of business in Illinois. Under 28 U.S.C. § 1332(c)(1), Adtalem Global Education Inc. is deemed to be a citizen of Delaware and Illinois, which, in turn, makes Chamberlain College of Nursing and Health Sciences, LLC, a citizen of Delaware and Illinois, which, in turn, makes Chamberlain a citizen of Delaware and Illinois.

**Plaintiff's Lawsuit**

3. On June 27, 2023, Plaintiff commenced this case against “Chamberlain University College of Nursing and Health Science, Inc., d/b/a Chamberlain University” in the Circuit Court of the City of St. Louis City, Missouri, for breach of contract, violation of the Missouri Merchandising Practices Act, Mo. Rev. Stat. § 407.010 *et seq.*, and other claims. A copy of Plaintiff’s petition, the state court docket, and all the process, pleadings, orders, and other documents that have been served on Chamberlain or are on file in the state court is attached to this notice of removal as Exhibit A.

4. “Chamberlain University College of Nursing and Health Science, Inc.” does not exist. Plaintiff was enrolled as a student at Chamberlain College of Nursing LLC, which became Chamberlain University LLC.

5. Plaintiff’s claims arise from her enrollment as a student at Chamberlain in its nursing program.

6. Plaintiff seeks compensatory damages in the approximate amount of \$140,244 and punitive damages in the amount of \$10,000,000. Pet. ¶¶ 33, 35.

**The Court Has Diversity Jurisdiction Under 28 U.S.C. § 1332(a)(1)**

7. The Court has original diversity-of-citizenship jurisdiction under 28 U.S.C. § 1332(a)(1) because Plaintiff and Chamberlain are citizens of different states and the amount in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs.

8. Because there is complete diversity of citizenship and the amount in controversy requirement is satisfied, the Court has original subject matter jurisdiction of this action pursuant to 28 U.S.C. § 1332(a)(1) (diversity jurisdiction), and Chamberlain may remove this action to this Court pursuant to 28 U.S.C. § 1441(a).

**Chamberlain's Notice of Removal Is Timely**

9. Chamberlain has filed its notice of removal within 30 days after it was served with a summons and Plaintiff's petition on August 11, 2023. Accordingly, Chamberlain's notice of removal is timely under 28 U.S.C. § 1446(b)(1).

WHEREFORE, Chamberlain requests that the Court take jurisdiction over this action and grant all other relief to which it is entitled.

Respectfully submitted,

THOMPSON COBURN LLP

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Attorneys for Defendant

Chamberlain University LLC

**Certificate of Service**

I hereby certify that a true and correct copy of the foregoing notice of removal has been mailed, first class mail postage prepaid, on September 8, 2023, to:

Tamara Hawkins  
2322 Menard Street  
St. Louis, Missouri 63104

/s/ Jeffrey R. Fink